

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

AMERICAN CIVIL LIBERTIES UNION,)	
<i>et al.,</i>)	
)	
Plaintiffs,)	
)	Civil Action No. 98-CV-5591
v.)	
)	
ALBERTO R. GONZALES, in his official)	
capacity as Attorney General of the United)	
States,)	
)	
Defendant.)	

DEFENDANT'S MOTION FOR A PROTECTIVE ORDER

Pursuant to Federal Rule of Civil Procedure 26(c) and Local Rule 7.1, Defendant, by his attorneys the United States Department of Justice, moves for a protective order from certain discovery propounded upon him on August 28, 2005. The reasons for this motion are set forth in the accompanying memorandum of law and exhibits. A proposed order is attached.

Rule 26(c) Certification

In accordance with Federal Rule of Civil Procedure 26(c), the undersigned certifies that Defendant has in good faith conferred with Plaintiffs in an effort to resolve this dispute without court action.

Dated: November 22, 2005

Respectfully submitted,

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/s/

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States,)	
)	
Defendant.)	

ORDER

AND NOW this _____ day of _____, 2005, upon consideration of Defendant's Motion for a Protective Order, it is hereby **ORDERED** that:

Defendant's Motion for a Protective Order is **GRANTED**, and it is hereby further **ORDERED** that:

- (1) Defendant need not respond to Plaintiff's Document Requests J, K, L, M, GG, and Plaintiff's Interrogatories P and Q; and
- (2) Plaintiff's Document Requests I and P are construed in the manner set forth in Defendant's Motion for Protective Order and accompanying memorandum of law.

Lowell A. Reed, Jr., S.J.